



January 18, 2018

Marlene H. Dortch, Esq.
Secretary
Federal Communications Commission
445 12th Street SW
Washington DC 20554

Re: Notice of Ex Parte Communication, MB Docket No. 17-105

Dear Ms. Dortch:

Today, I spoke by telephone with Holly Saurer, Associate Chief of the Media Bureau, regarding proposals of the National Association of Broadcasters (NAB) to modernize the Commission's equal employment opportunity (EEO) rules. Specifically, we discussed changes that could obviate the need for broadcasters to file the EEO Mid-Term Report (Form 397), without reducing the ability of Commission staff to conduct a mid-term review of broadcasters' compliance with the EEO rules.

During the call, I observed that in a previous filing,¹ NAB identified two potential options that could facilitate the Commission's ability to identify which stations are subject to a mid-term review: (1) require all stations subject to the EEO rules to indicate whether they qualify for a mid-term review on their annual EEO public file reports; or (2) add a gating field to the online public file database that would require all stations to indicate whether they qualify for a mid-term review as a prerequisite to filing their annual EEO public file report.

I explained that, after gathering additional information from member stations, NAB believes that the best approach for identifying stations subject to the mid-term review is to require stations to indicate whether they qualify for a mid-term review on their annual EEO public file reports (or option 1 above).

NAB appreciates the ongoing efforts of the Commission and its staff to modernize broadcast

¹ See Letter to Marlene H. Dortch, Secretary, FCC from Lawrence A. Walke, Associate General Counsel, NAB, MB Docket No. 17-105 (December 17, 2017).

regulations.

Please direct any inquiries regarding this matter to the undersigned.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'ERL Dozier', with a stylized, cursive-like flow.

Erin L. Dozier
Senior Vice President and Deputy General Counsel
Legal and Regulatory Affairs

cc: Michelle Carey, Holly Saurer, Martha Heller